

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

DANIEL DEFENSE, INC.,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
v.)	4:14-cv-00131-WTM-GRS
)	
REMINGTON OUTDOOR COMPANY,)	
INC., AKA FREEDOM GROUP, INC. and)	
REMINGTON ARMS COMPANY, LLC)	
DBA DPMS FIREARMS/PANTHER)	
ARMS,)	
)	
Defendants.)	
)	

**DANIEL DEFENSE, INC.'S MOTION TO EXCEED 25 PAGE LIMIT FOR
BRIEF IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

COMES NOW Plaintiff Daniel Defense, Inc. ("Daniel Defense"), and moves this Court for an order to exceed the twenty-five (25) page limit on briefs contained in Local Rule 7.1(a). Daniel Defense hereby requests this Court's permission to exceed the twenty-five (25) page limit by twelve (12) pages for a total page limit of thirty-seven (37) pages, not including the Certificate of Service.

The instant case involves causes of action of infringement by Defendants Remington Outdoor Company, Inc. (AKA Freedom Group, Inc.) and Remington Arms Company, LLC (dba DPMS Firearms/Panther Arms) (collectively, the "Defendants") of two Daniel Defense federally registered trademarks. Such causes of action are based in state and federal law, and they are fact intensive, complicated, and require a detailed description of the factual background of the Daniel Defense trademarks. Further, Daniel Defense respectfully submits to this Court that the Brief requires a comprehensive legal

analysis of the applicable law's application to the facts of the instant case to demonstrate the four elements that this Court must consider in order to issue a preliminary injunction, and the twenty-five (25) page maximum will not allow Daniel Defense to adequately set forth its arguments in support of its motion. Such analysis and demonstration includes fourteen (14) photographs, from, but not including, Defendants' websites and catalogues, and such photographs comprise approximately seven (7) pages of the Brief. Although such photographs could be attached as exhibits to the Brief, the inclusion of such photographs in immediate proximity to the written legal analysis provides a more efficient and flowing application of the law to the facts of this case, rather than the alternative requirement of repetitive page turning from the legal analysis to separate exhibits.

WHEREFORE, Daniel Defense respectfully requests that this Court issue an order permitting Daniel Defense to exceed the twenty-five (25) page limit by twelve (12) pages for a total page limit of thirty-seven (37) pages, not including the Certificate of Service.

Respectfully submitted this 10th day of November, 2014.

/s/ Justin Charles Ward
Justin Charles Ward
Georgia State Bar No. 746408
jward@danieldefense.com

DANIEL DEFENSE, INC.
101 Warfighter Way
Black Creek, GA 31308
Tel: (912) 851-3293
Fax: (912) 851-3249

/s/ William G. Glass
William G. Glass

Georgia Bar No. 297340
bglass@wswgs.com
/s/ A. Robert Casella
Georgia Bar No. 115611
rcasella@wswgs.com

WEINER, SHEAROUSE, WEITZ,
GREENBERG & SHAWE, LLP
Post Office Box 10105
Savannah, GA 31412
Tel: (912) 233-2251

Attorneys for Plaintiff Daniel Defense, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 10th, 2014, I have served DANIEL DEFENSE, INC.'S MOTION TO EXCEED 25 PAGE LIMIT FOR BRIEF IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION in accordance with the notice of electronic filing requirements on the following attorneys of record:

Nathan C. Belzer
Belzer, PC
2905 Bull Street
Savannah, Georgia 31405

/s/ Justin Charles Ward
Justin Charles Ward
Georgia State Bar No. 746408
jward@danieldefense.com

DANIEL DEFENSE, INC.
101 Warfighter Way
Black Creek, GA 31308
Tel: (912) 851-3293
Fax: (912) 851-3249

/s/ William G. Glass
William G. Glass
Georgia Bar No. 297340
bglass@wswgs.com
/s/ A. Robert Casella
Georgia Bar No. 115611
rcasella@wswgs.com

WEINER, SHEAROUSE, WEITZ,
GREENBERG & SHAWE, LLP
Post Office Box 10105
Savannah, GA 31412
Tel: (912) 233-2251

Attorneys for Plaintiff Daniel Defense, Inc.